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September 27, 2019

VIA ECF

Judge Vernon S. Broderick
United States District Court Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: **Namel Norris v. 81 Pearl Street Venture LTD, et al,**
1:19-cv-06640 (VSB)

Dear Judge Broderick:

We were just retained to represent defendant Louise Properties Inc. (“Louise Properties”) in the above-captioned Americans With Disabilities Act matter. We write with the consent of counsel for the Plaintiff and counsel for defendant 81 Pearl Street Venture LTD (“Pearl Street”)(both defendants together, “Defendants”) to request an adjournment of both Defendants’ time to respond to the Complaint for approximately 45 days (the longer period due to the intervening Jewish holidays).

The reasons for the request are that we were just this morning retained to represent Louise Properties and request time to confer with our client, investigate the allegations in the Complaint, confer with Mr. Kleinberg and confer with counsel for the Plaintiff concerning a potential early resolution. We understand that Louise’s time to respond to the Complaint expired on August 27, 2019; Pearl Street’s time to respond to the Complaint expires this Monday, September 30, 2019. We request an adjournment on behalf of both Defendants since Defendants are, respectively, tenant and landlord, and request time to confer with each other concerning defense of this action.

I have spoken with counsel for Plaintiff, Bob Mirel, and counsel for Pearl Street, Adam Kleinberg, and they both consent to the request. This is Louise Properties’ first request for an adjournment and Pearl Street’s second request (the first request was granted).

Respectfully Submitted,

PRYOR CASHMAN LLP

By: /s/ Sarah E. Bell
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